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Co-counsel for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DAVID BELBIN, et al.,	:	
	:	CIVIL ACTION
Plaintiffs	:	
	:	1:13-05583-RBK-KMW
v.	:	
	:	(Master Docket No. 13-cv-784)
CONSOLIDATED RAIL	:	
CORPORATION, et al.,	:	Return Date: Dec. 16, 2013
	:	
Defendants.	:	
	:	

**PLAINTIFFS' RENEWED MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

TO: Brian Pagano, Esq.
BURNS WHITE LLC
51 Haddonfield Road, Suite 140
Cherry Hill, NJ 08002-4803

PLEASE TAKE NOTICE that, on December 16, 2013, the undersigned,
Joseph Alan Venti, Esq., of the firm Williams Cuker Berezofsky, LLC, counsel for
Plaintiffs, shall make application before the United States District Court for the

District of New Jersey pursuant to Local Court Rule 5.3 for an Order granting Plaintiffs leave to file under seal unredacted versions of the Memorandum of Law (ECF No. 16-1) and the Certification of Mark R. Cuker, Esq. (ECF No. 16-2), both submitted in support of their Motion to Remand Proceedings to the Superior Court of Gloucester County, New Jersey (ECF No. 16). In support of this Motion, the undersigned shall rely upon the attached Declaration of Joseph Alan Venti, Esq. and appended exhibit. A proposed form of Order is attached. Unredacted versions of the confidential materials are being filed under seal contemporaneous with this Motion, pursuant to Local Rule 5.3(c)(3).

PLEASE TAKE FURTHER NOTICE that the within application is made upon the papers, and unless counsel for Defendants otherwise object, no oral argument is requested.

Respectfully:

WILLIAMS CUKER BEREZOFSKY LLC
Counsel for Plaintiffs

BY: /s/ Joseph Alan Venti
JOSEPH ALAN VENTI, ESQ.

Date: November 18, 2013